

March 3, 1998

The Honorable Elizabeth A. Moler
Deputy Secretary of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585-1000

Dear Ms. Moler:

As you know, a member of the Defense Nuclear Facilities Safety Board (Board) and several of the Board's staff participated in the recent workshop on Integrated Safety Management held in Albuquerque, New Mexico. The Board has been briefed by our attendees on this meeting. The Board wishes to share some of their observations with you and the Department of Energy's (DOE) Safety Management Integration Team (SMIT) in the interest of furthering the successful implementation of this safety management upgrade concept.

Foremost, your address to the assembled groups, wherein you affirmed DOE's commitment to implement the safety management concept, was reported by the Board attendees as being highly salutary. It served to dispel any lingering doubts among those reluctant to change as to the steadfastness of the current Office of the Secretary relative to DOE Policy P-450.4 on Integrated Safety Management.

Both attendance at the meeting and the interchanges at the breakout sessions evidenced the considerable attention this effort is receiving and the results of the missionary efforts of the SMIT. Valuable experiences were shared by those who have been at the forefront of implementation efforts. Unfortunately, however, at this workshop, as at its predecessors, those having primary responsibility for safety—line managers—were far fewer in number than those providing support or secondary guidance functions.

A key step in the implementation of Integrated Safety Management Systems (ISMS) involves reviews conducted by DOE to verify the adequacy of contractors' systems. Three such verification reviews have been executed to date. The sharing of lessons learned from these verification reviews was one of the highlights of the workshop. The enclosure to this letter contains some of the most important lessons learned from this experience that the Board believes need to be considered as all future verification review approaches are developed.

The Board wishes to reemphasize that the commitments in the DOE implementation plan for Board Recommendation 95-2 included expeditious upgrading to ISMS principles and core functions of safety management programs at 10 operating priority facilities. Site-wide institutionalization of ISMS infrastructure and DOE's efforts to verify the adequacy of that infrastructure should be proceeding in parallel with these upgrades. The Board workshop participants came away with the impression that the facility implementation efforts on some priority facilities are being delayed until site/corporate manuals of practice and implementing procedures are developed. Responsible DOE line management needs to ensure that this is not the case. The Board looks to the DOE Safety Management Implementation Team to exert strong leadership to ensure the proper balancing of these two parallel and complementary ISMS implementation actions.

Should you have any questions about this matter, please contact me.

Sincerely,

John T. Conway
Chairman

c: Mr. Richard Crowe
Mr. Mark B. Whitaker, Jr.

Enclosure

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Verification Reviews: Lessons Learned

- Verification teams consisting of both experienced site and nonsite team members make for a more effective review. The cognizant Department of Energy (DOE) operations and/or area offices can provide verification review team members who have extensive familiarity with the site hazards and contractor's Integrated Safety Management System (ISMS) mechanisms. The contribution these individuals can make is of great value, as long as they are able to distance themselves from the demands of their normal duty assignments. However, it is highly beneficial for each team to be balanced by the inclusion of nonlocal individuals who can bring a fresh and unencumbered perspective to the evaluation. Future verification reviews can benefit by including individuals with prior experience at other sites' verifications, as well as new trainees, both during the review approach development phase and during execution. Doing so will enable the DOE complex-wide verification process to continue to evolve.
- The verification process is more likely to proceed expeditiously if the verification team communicates well in advance of the review what support (access to people, briefings and documents) will be required from the contractor or contractors on the site, and ensures that this support will be provided. The contractors must play an active role in educating the verification review team about the component mechanisms of their ISMS, as well as how the various components of the system interface to become a comprehensive whole. It is extremely ineffective for the verification review team to attempt to evaluate the contractor's ISMS mechanisms without this support by the contractor. Two prerequisites of the verification review are that the contractor has developed a clear vision and understanding of how the component ISMS mechanisms work together to achieve the principles of ISMS for the scope of work at the site, and that all of these mechanisms are in existence for the review team to verify.
- It would be beneficial for each DOE verification review team to research extensively the experiences and findings of earlier reviews at other sites in planning a review. Certain deficiencies are commonly being uncovered, in such areas as activity-level work planning for nonmission work, hazard analysis and controls development, configuration management of those controls, and feedback and improvement. Areas of needed improvement at other sites are likely to suggest potentially fruitful lines of inquiry. Overall, while the contractual arrangements and organizational structures at each site are unique, and the verification review approaches for each will need to be tailored accordingly, there still ought to be many beneficial lessons to be learned from earlier reviews.
- Verification reviews to date have shown gaps in key safety management programs and/or control measures. However, paths forward have not been routinely established. It is important that a plan forward be established to address all findings of the review team and to assign responsibility for corrective actions.